

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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OLD LADDER LITIGATION CO., LLC., as Litigation  
Designee on behalf of the Liquidation Trust,

Plaintiff,

- against -

INVESTCORP BANK B.S.C., et al.,

Defendant.  
----- X

08 CV 0876 (RMB) (THK)

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

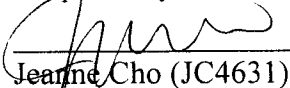
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the  
Southern and Eastern Districts of New York, I, Jeanne Cho, a member in good standing of the  
bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Colleen M. Feeney  
Schiff Hardin LLP  
6600 Sears Tower  
Chicago, IL 60606  
312-258-5717  
312-258-5600 (Fax)

Colleen M. Feeney is a member in good standing of the Bar of the State of Illinois. There are no  
pending disciplinary proceedings against Colleen M. Feeney in any State or Federal court.

Dated: May 16, 2008  
New York, New York

Respectfully submitted,

  
\_\_\_\_\_  
Jeanne Cho (JC4631)

Schiff Hardin LLP  
900 Third Avenue  
New York, NY 10022  
212-753-5000  
212-753-5044 (Fax)  
jcho@schiffhardin.com

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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OLD LADDER LITIGATION CO., LLC., as Litigation	:	
Designee on behalf of the Liquidation Trust,	:	
	:	08 CV 0876 (RMB) (THK)
Plaintiff,	:	
	:	<b>AFFIDAVIT OF JEANNE CHO</b>
- against -	:	<b>IN SUPPORT OF MOTION TO</b>
	:	<b>ADMIT COLLEEN M. FEENEY</b>
INVESTCORP BANK B.S.C., et al.,	:	<b><u>PRO HAC VICE</u></b>
	:	
Defendant.	:	
-----	X	

State of New York            )  
                                      )       ss:  
County of New York        )

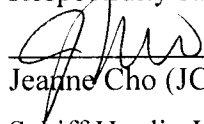
Jeanne Cho, being duly sworn hereby deposes and says as follows:

1. I am an associate at Schiff Hardin LLP and counsel for Defendant, John J. Fiumefreddo, in the above captioned action. I am familiar with the proceedings in this case. I make that statement based on my personal knowledge of the facts set forth herein and in support of Defendant, John Fiumefreddo's motion to admit Colleen M. Feeney as counsel *pro hac vice* to represent him in this matter.
  2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 2005. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
  3. I have known Colleen M. Feeney since 2006.
  4. Ms. Feeney is an associate at Schiff Hardin LLP in Chicago, Illinois.
  5. I have found Ms. Feeney to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
  6. Accordingly, I am pleased to move the admission of Colleen M. Feeney, *pro hac vice*.
  7. I respectfully submit a proposed order granting the admission of Colleen M. Feeney, *pro hac vice*, which is attached hereto as Exhibit A.
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WHEREFORE, it is respectfully requested that the motion to admit Colleen M. Feeney, *pro hac vice*, to represent John J. Fiumefreddo in the above captioned matter, be granted.

Dated: May 16, 2008  
New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'JC', is written over a horizontal line.

Jeanne Cho (JC4631)

Schiff Hardin LLP  
900 Third Avenue  
New York, NY 10022  
212-753-5000  
212-753-5044 (Fax)  
jcho@schiffhardin.com

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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OLD LADDER LITIGATION CO., LLC., as Litigation	:	
Designee on behalf of the Liquidation Trust,	:	
	:	08 CV 0876 (RMB) (THK)
Plaintiff,	:	
	:	<b>ORDER FOR ADMISSION</b>
- against -	:	<b>PRO HAC VICE</b>
	:	<b><u>ON WRITTEN MOTION</u></b>
INVESTCORP BANK B.S.C., et al.,	:	
	:	
Defendant.	:	
-----	X	

Upon the motion of Jeanne Cho, attorney for Defendant John J. Fiumefreddo and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Colleen M. Feeney  
Schiff Hardin LLP  
6600 Sears Tower  
Chicago, IL 60606  
312-258-5717  
312-258-5600 (fax)  
cfeeney@schiffhardin.com

is admitted to practice *pro hac vice* as counsel for John J. Fiumefreddo in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) systems, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: May 16, 2008  
New York, New York

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United States District/Magistrate Judge

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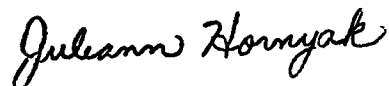
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Colleen Michelle Feeney

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 6, 2003 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Monday, May 12, 2008.



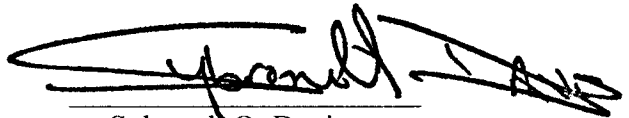
Clerk

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16<sup>th</sup> day of May, 2008, I caused to be served via First Class U.S. Mail, a true and correct copy of Motion to Admit Counsel Pro Hac Vice Colleen Feeney, Affidavit of Jeanne Cho in Support of Motion and Order for Admission upon each of the following individual:

J. Christopher Shore  
White & Case LLP  
1155 Avenue of the Americas  
New York, NY 10036

New York, New York  
May 16, 2008



Sybrandt O. Davis